

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re: § **Chapter 11**
EMAS CHIYODA SUBSEA LIMITED, § **Case No. 17-31146 (MI)**
et al. § **(Joint Administration Pending)**
§ **Debtors.¹**

NOTICE OF PERFECTION OF MARITIME LIEN PURSUANT TO SECTION 546(b)

Keppel Shipyard Limited (“Keppel”) hereby gives notice pursuant to 11 U.S.C. § 546(b) of the perfection of its maritime lien under 46 U.S.C. § 31342.

Keppel is a secured creditor by virtue of a general maritime lien under 46 U.S.C. §31342 and asserts an *in rem* secured claim in the amount of \$426,768.60, plus interest and attorneys’ fees. This represents unpaid amounts due and owing for the provision of necessities to the M/V LEWEK CONSTELLATION, in the form of various services provided in 2016, such as the following:

1. quayside services to support work on the vessels;
2. fresh water supply to vessel;
3. cooling water lines supply;
4. garbage and refuse removal;
5. asbestos sanitation;
6. sea chest deaeration pipes;
7. sea valves overhauling;
8. hull and WBT cleaning;
9. sea chest cleaning;
10. hull markings;
11. SB mooring platform repairs;

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number and jurisdiction of formation are as follows: EMAS CHIYODA Subsea Limited (UK) (3187); EMAS Chiyoda Subsea Inc. (Delaware) (7884); EMAS CHIYODA Subsea Marine Base LLC (Texas) (5974); Lewek Falcon Shipping Pte. Ltd. (Singapore) (041E); EMAS CHIYODA Marine Base Holding Co., LLC (Texas) (7463); EMAS Chiyoda Subsea Services Pte. Ltd. (Singapore) (333Z); EMAS-AMC Pte. Ltd. (Singapore) (0442); EMAS Saudi Arabia Ltd. (Saudi Arabia) (0669); Lewek Constellation Pte. Ltd. (Singapore) (376E); EMAS CHIYODA ROV Pte. Ltd. (Singapore) (049M); EMAS CHIYODA Subsea Services B.V. (Netherlands) (4073); EMAS CHIYODA Subsea Services (UK) Limited (Scotland) (3187); EMAS CHIYODA Subsea Services LLC (Delaware) (1728); EMAS CHIYODA Subsea (Thailand) Co., Ltd. (Thailand) (1011); Gallatin Marine Management, LLC (Delaware) (8989). The address of the Debtors’ U.S. headquarters is 825 Town & Country Ln, Suite 1500, Houston, TX 77024.

12. wooden fendering work;
13. anti-fouling paint work;
14. bilge holding tank cleaning;
15. thrusters inspection / service;
16. PHC module support fabrication and installation;
17. moonpool bellmouth assembly; and
18. engine room tanktop/bilge cleaning work.

The claim is set forth in further detail in Keppel's Proof of Claim (Claim # 315). These services qualify as "necessaries" and establish that Keppel is a maritime lienholder against the M/V LEWEK CONSTELLATION. 46 U.S.C. §§ 31301(4), 31342. A maritime lien "is a special property right in the vessel, arising in favor of the creditor by operation of law as security for a debt or claim." *Equilease Corp. v. M/V SAMPSON*, 793 F.2d 598, 602 (5th Cir. 1986) (citations omitted). The lien attaches and is perfected when the underlying debt or claim arises. *See id.* at 603. "Thus the maritime lien may be defined as a property right that adheres to the vessel wherever it may go." *Id.* at 602.

Keppel reserves the right to supplement and/or amend this notice. Keppel further reserves all rights under applicable law.

Dated: May 19, 2017

Respectfully submitted,

/s/ Keith N. Uhles

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of May, 2017, a true and correct copy of the foregoing was served pursuant to the Federal Rules of Bankruptcy Procedure via the CM/ECF Filing System to all counsel of record.

/s/ Keith Uhles _____

Keith Uhles